

July 6th, 2006

Federal Trade Commission/Office of the Secretary, Room H-135
(Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its presented form, it could prevent me from continuing as a Nikken Independent Wellness Consultant and destroy my small business opportunity.

I have been a Nikken Independent Wellness Consultant for more than 10 years.

My wife and I began our Network Marketing business because of the life changing Nikken products. We wanted to share these life changing products and earn extra income while doing it. We now use this extra income to help others. Please don't destroy my small business!

Some of the sections in the proposed rule would make it extremely difficult, if not impossible, for me to operate my Nikken business.

The proposed waiting period gives a false impression that Nikken Independent Wellness Consultants are dishonest business people that the public needs to be protected from. Nothing is further from the truth! The seven-day waiting period is unnecessary, because Nikken has a very fair buyback policy for all products.

The proposed seven day waiting period to enroll a new Nikken Independent Wellness Consultant is unconstitutional and discriminates against Network Marketing. If the government wants to propose a seven day rule, it should apply to all transactions. Apply the rule equally. Make the seven day rule apply to buying a house, buying a car, buying a prescription at the pharmacy, marriage ceremonies, buying a TV, buying a computer, taking an airplane flight, etc. The list is endless.

Nikken's Independent Wellness Consultant Sign-up fee is only \$49. People buy TVs, cars, and other items that cost much more than that and they don't have to wait seven-days. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone a prospect and will then have to send in reports to my company. Even the highly regulated insurance business isn't required to submit this amount of paperwork. This is an impractical and discriminatory proposed rule.

Another impractical section is the proposed rule that requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. In this day of identity theft and "people stockers", people are very reluctant to have their names and personal information given out to the general public, especially if they are women.

I have seen many scams on the Internet and also advertised in my local newspaper. This rule will do nothing to stop them. The only thing that the proposed rule will do is to hinder my business and make it much more difficult to earn the same amount of money.

The proposed rule will have a large negative effect on the Government. The proposed rule will lessen the amount earned by Network Marketers which in turn will lessen the amount of Federal Income Tax paid. In this era of an increasing Federal deficit do you want to do this?

Thank you for taking time to read this. If you have any questions or would like more information, please don't hesitate to contact me.

Sincerely,

Joe Lukac
Nikken Independent Wellness Consultant

